

FOOD INSECURITY ACROSS U.S. COLLEGE CAMPUSES

by
Yariany Perez-Nieto

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Abstract

Food insecurity is a prevalent issue across homes in the United States. Much of the existing research pays particular attention to students in K-12 education and the impact hunger has in academic performance. In January of 2019, The U.S. Government Accountability Office (GAO) issued a report calling to action solutions to help food insecurity for students across college campuses. This memo focuses on the gap of resources attributed to food insecurity in post-secondary institutions and looks at existing methods that universities are taking to combat student hunger. Taking elements from prominent researchers from the field, proposed solutions include expanding access to the National School Lunch Program (NSLP) and developing an effective marketing plan to provide more information to students on existing federal programs like the Supplemental Nutrition Assistance Program (SNAP).

Table of Contents

Action Forcing Event	Page 1
Statement of the Problem	Page 1
History/Background	Page 6
Policy Proposal	Page 17
Policy Analysis	Page 22
Political Analysis	Page 30
Recommendation	Page 35

MEMORANDUM

To: Diane Jones, Principal Deputy Under Secretary, Office of Postsecondary Education, U.S. Department of Education

From: Yariany Perez-Nieto

Re: Food Insecurity on College Campuses

Action Forcing Event

At the request of four Senate Democrats, the U.S. Government Accountability Office (GAO) publicly released a report on January 9, 2019 titled, “Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits” detailing food insecurity in students across colleges in America. Of the students surveyed for the report, between 42 and 56 percent were food insecure and 36 percent were insecure in the 30 days prior to the most recent survey.¹ The students who are most vulnerable of food insecurity and the academic consequences it can cause, are low-income, first-generation, and minority students.

Statement of the Problem

Food insecurity in the United States is a public health problem affecting families and students across the nation. According to the United States Department of Agriculture, food insecurity is defined as not having an adequate or enough food supply.² In 2017, food insecurity was, on average, 11.8% higher for households with children (15.7%),

¹ Office, U.S. Government Accountability. "Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits." U.S. Government Accountability Office (U.S. GAO). January 09, 2019. <https://www.gao.gov/products/GAO-19-95>.

² Department of Agriculture, U.S. "USDA ERS - Key Statistics & Graphics." USDA ERS - Key Statistics & Graphics. September 5, 2018. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx>

Black or African-American households (21.8%), Hispanic households (18%) and low-income households (30.8%).³

Research studies in the last 5 years have brought to light the effects food insecurity has on student achievement in college environments. Students who experience food insecurity also report lower scores in math, lower scores in reading, and decreased memory function.⁴ Overall low academic achievement, behavioral and attention problems, and psychological development issues are also seen among student populations in K12 and postsecondary students.⁵ However, for college students, the level of interventions available to close the gap in hunger and academic achievement is not the same as is prevalent in K12 districts.

College students who experience food insecurity are faced with effects on academic achievement, wellness, and behavior; these indicators are critical for retention and on-time graduation rates.⁶ In a study conducted at the University of Florida and nine other universities, it was found that of the 900 students who participated in the study, 19% were classified as food insecure and were found to have higher stress, disordered

³ Department of Agriculture, U.S. "USDA ERS - Key Statistics & Graphics." USDA ERS - Key Statistics & Graphics. September 5, 2018. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics.aspx>

⁴ Clare L. Cady (2014) Food Insecurity as a Student Issue, *Journal of College and Character*, 15:4, 265-272. <https://naspa.tandfonline.com/doi/pdf/10.1515/jcc-2014-0031?needAccess=true>

⁵ Payne-Sturges, D. C., Tjaden, A., Caldeira, K. M., Vincent, K. B., & Arria, A. M. (2018). Student Hunger on Campus: Food Insecurity Among College Students and Implications for Academic Institutions. *American Journal of Health Promotion*, 32(2), 349–354.

⁶ Wooten, Ruth, Marsha Spence, Sarah Colby, and Elizabeth Anderson Steeves. "Assessing Food Insecurity Prevalence and Associated Factors among College Students Enrolled in a University in the Southeast USA." *Public Health Nutrition*. December 21, 2018. <https://www.ncbi.nlm.nih.gov/pubmed/30572972>.

eating behaviors, and grade point averages below 3.0.⁷ Students who have trouble covering costs for food are, oftentimes, also those coming from low-income households. These students are more likely to take up a job to help ease the expenses of postsecondary schooling. Students who work on average of 10-15 hours a week see a positive impact on grades and engagement yet for students who work more than that, student GPA's and academic achievement is compromised.⁸ In a study conducted across 34 post-secondary institutions, it was found that of the 56% of students who responded as being food insecure and having a paying job, 38% worked more than 20 hours per week.⁹ This hourly overage has a higher probability of causing a negative impact on student GPA and academic performance.

Wisconsin Hope Lab found that students experiencing food insecurity still exhibited very similar levels of commitment to college and their education. Yet, for these students, there was correspondingly less time attributed to leisure activities and sleeping and more towards taking care of children and/or adults. Despite this, there are strong correlations between food insecurity and poor academic performance. As the study indicates, “students who reported receiving D’s and F’s in college, more than half were food insecure.”¹⁰

⁷ Elzein, A., Shelnutt, K., Colby, S., Olfert, M., Kattelman, K., Brown, O., . . . Mathews, A. (2017, January 11). Prevalence of Food Insecurity and Its Association with Health and Academic Outcomes among College Freshmen. Retrieved from <https://academic.oup.com/advances/article/8/1/4/4568361>

⁸ Dubick, J., Matthews, B., & Cady, C. (2016, October). Report: Hunger On Campus. Retrieved from <https://studentsagainsthunger.org/hunger-on-campus/>

⁹ Ibid.

¹⁰ Goldrick-Rab, S., Richardson, J., Schneider, J., Hernandez, A., & Cady, C. (2018, April). Wisconsin Hope Lab: STILL HUNGRY AND HOMELESS IN COLLEGE. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>

Demographics

Food insecurity is prevalent in minority, first generation, and/or low-income students. A 2016 report published by Hunger on Campus, “The Challenge of Food Insecurity for College Students” found that food insecurity occurs at both 2-year and 4-year institutions. The study captured 3765 responses from 34 institutions. It was found that 48% of students reported food insecurity in the past 30 days. Fifty-seven percent of Black or African American students reported food insecurity compared to 40 percent of non-Hispanic white students. About 56% of first-generation students were also food insecure compared to the 45% of students who had at minimum one parent attend college. More than half of students who present issues with food insecurity are Pell Grant recipients and/or take out loans during the current academic year. These students also reported having used existing aid services in the last 12 months like the Supplemental Nutrition Assistance Program (SNAP).¹¹

Food Insecurity Indicator for Housing Insecurity

Food insecurity is one indicator of obstacles that low income, first generation, and minority students disproportionally face while in post-secondary institutions. Students who experience food insecurity are also suffering from housing insecurity. Students are oftentimes required to make decisions between cutting costs for food versus keeping up with expenses linked with attending college. Thirty-two percent of students believed that

¹¹ Goldrick-Rab, S., Richardson, J., Schneider, J., Hernandez, A., & Cady, C. (2018, April). Wisconsin Hope Lab: STILL HUNGRY AND HOMELESS IN COLLEGE. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>

hunger or housing problems had a direct impact on their education with issues ranging like not purchasing required textbooks (55%), missing classes (53%), to dropping a class (25%). In a more recent study conducted by the Wisconsin Hope Lab (2018), researchers found that 22% of students in community colleges were both food and housing insecure during the last year. For students in a university setting, the figure was 16% indicating that food insecurity had more effects for community college students than students in 4-year institutions.¹²

Issues with Public Assistance Programs

Financial aid has not been keeping pace with the rising costs of college and university education. College board reports that for school year 2017-18, after accounting for grant aid and tax benefits, full-time students had to cover \$8,070 in room and board while at four-year public institutions, families had to cover \$14,940.¹³ Public assistance programs are riddled with requirements that college students may not be able to meet. For the SNAP program, individuals are required to work 20 hours a week at a minimum to be eligible for aid. As is noted above, students working more than 15 hours a week are comprising their academic success. And while some universities and colleges are trying to meet the needs of their student bodies, generally, colleges are not equipped with handling the changing demographics of their student population.

¹² Goldrick-Rab, S., Richardson, J., Schneider, J., Hernandez, A., & Cady, C. (2018, April). Wisconsin Hope Lab: STILL HUNGRY AND HOMELESS IN COLLEGE. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>

¹³ CollegeBoard. (2017). CollegeBoard: Trends in College Pricing 2017. Retrieved from https://trends.collegeboard.org/sites/default/files/2017-trends-in-college-pricing_1.pdf

For some programs, like state need-based tuition aid, eligible students may not even receive the grant funds due to administrative hurdles like budget cuts and lack of funding to cover all eligible student applicants.¹⁴ In 2017, 900,000 low-income students never received the aid that they were found to be eligible for. As more students apply for these grants, the funds run out at a much quicker rate leaving low-income students with limited to no other options in supplemental funding for college.

History/Background

Students in college today look very different than students from 20 years ago. According to the National Education Center for Statistics, “college enrollment rate for young adults increased from 35 percent in 2000 to 41 percent in 2016.” Within this time frame, we see an enrollment increase of about 3 percentage points for White young adults, 6 percentage points for Black young adults, and 17 percentage points for Hispanic young adults.¹⁵ We are also seeing students who are considered “nontraditional” - defined as those who are “low-income, first-generation, above the age of 23, financially independent, living off campus and attending part-time” - increase at rates that soon can surpass those of which higher education institutions have traditionally served.¹⁶ More students of all backgrounds are going to school and more schools are adapting their

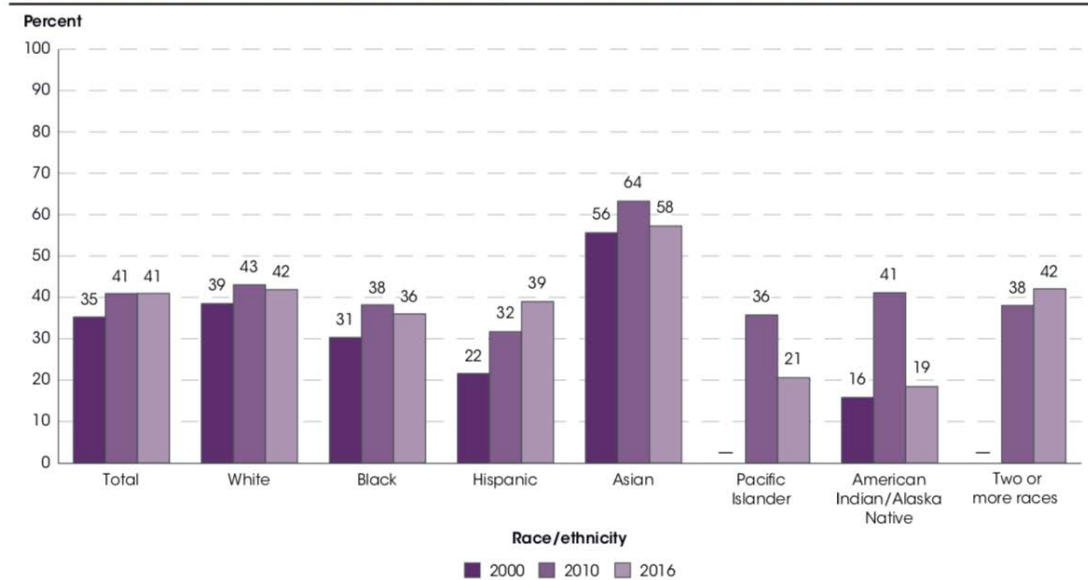
¹⁴ Kolodner, Meredith. "Eligible for Financial Aid, Almost One-third of Students Never Get It." The Hechinger Report. February 06, 2019. <https://hechingerreport.org/eligible-for-financial-aid-almost-one-third-of-students-never-get-it/>.

¹⁵ "College Enrollment Rates." The Condition of Education - Postsecondary Education - Postsecondary Students - College Enrollment Rates - Indicator February (2019). May 2018. https://nces.ed.gov/programs/coe/indicator_cpb.asp.

¹⁶ Barrett, Ben. "By the Numbers: Trends in Nontraditional Student Enrollment." New America. May 16, 2018. <https://www.newamerica.org/education-policy/edcentral/numbers-trends-nontraditional-student-enrollment/>.

policies and practices to adjust to these new students.¹⁷

Figure 2. Enrollment rates of 18- to 24-year-olds in colleges, by race/ethnicity: 2000, 2010, and 2016



— Not available.
 † Interpret data with caution. The coefficient of variation (CV) for this estimate is between 30 and 50 percent.
 NOTE: Data are based on sample surveys of the civilian noninstitutionalized population. Separate data for Pacific Islanders and persons of two or more races were not available in 2000. In 2000, data for individual race categories include persons of two or more races. Prior to 2003, data for Asians include Pacific Islanders. Race categories exclude persons of Hispanic ethnicity.
 SOURCE: U.S. Department of Commerce, Census Bureau, Current Population Survey (CPS), October Supplement, 2000, 2010, and 2016. See *Digest of Education Statistics 2017*, table 302.60.

Although there has been an increase in nontraditional student populations attending college, “between 2012 and 2016, the percentage of students receiving a Pell Grant and the percentage of those students whose parents do not hold a college degree dropped after more than a decade of steadily rising.” For first generation college students, we see this drop primarily affected by the public 2-year community college sector and availability for students to access pell grants overall. Most low-income students enroll in community colleges and are in more dire needs for financial assistance to attend higher

¹⁷ Westervelt, Eric. "Shaken By Economic Change, 'Non-Traditional' Students Are Becoming The New Normal." NPR. September 25, 2016. <https://www.npr.org/sections/ed/2016/09/25/495188445/shaken-by-economic-change-non-traditional-students-are-becoming-the-new-normal>.

education. In 2012, year-round Pell Grants were removed as a cost-savings measure, ultimately hurting enrollment figures for 2-year colleges.¹⁸

Food Access at Colleges/Universities

Although college hunger has been amplified with the changing demographics in post-secondary institutions, concise timing on when this became a problem still varies. Independent studies have been developed across different regions of the US that point to existing issues with food insecurity and the need to find solutions for students on college campuses. Presently, there is no national survey outlining this information across all institutions in the United States.

Study Analysis: University of Hawai'i at Manoa

Among the first published articles around food insecurity on college campuses was a study conducted in 2006 by the Department of Community Health Sciences at University of California Los Angeles. The study, published in 2009, looked at college hunger at the University of Hawai'i at Manoa. A cross-sectional survey was conducted to “assess the prevalence and identify possible predictors of food insecurity among college students.”¹⁹ The study included 441 non-freshman students from random classrooms. The results of the study showed that of the 441 students surveyed, 21% were food insecure and 24% were at risk of food insecurity.

¹⁸ Schwartz, Natalie. "Community Colleges See Summer Enrollment Rise after Pell Grant Expansion." Education Dive. November 15, 2018. <https://www.educationdive.com/news/community-colleges-see-summer-enrollment-rise-after-pell-grant-expansion/542297/>.

¹⁹ Chaparro, M. Pia, Sahar S. Zaghloul, Peter Holck, and Joannie Dobbs. "Food Insecurity Prevalence among College Students at the University of Hawai'i at Mānoa." Public Health Nutrition. November 2009. <https://www.ncbi.nlm.nih.gov/pubmed/19650961>.

Overall, the findings pointed that a higher proportion of students who were food insecure were also those who reported being of two or more ethnic backgrounds. A proposed recommendation from the research team was that a food bank could provide solutions to the hunger gap at the school. Also, the study noted that there is a need to assess food insecurity on college campuses on a larger scale nationwide.

Study Analysis: Public universities in Southeast U.S.

A 2016 study conducted in a large public university in Southeast, USA it was found that of the 4,824-student sample captured, 36% were classified as food insecure. The survey was conducted to assess the rates of food insecurity at a large university in the USA while also identifying potential factors associated with experiencing food insecurity.²⁰ The study collected information around food insecurity status, academic standing/success, health status, and demographic indicators. Researchers used the AFSSM questionnaire, the standard metric form USDA that used to assess food insecurity in adults.²¹ Students were also asked about their food security status prior to entering college, their gender, race, and ethnicity, and other socio-economic indicators.

Findings from the report linked student transition as a vulnerability of facing food insecurity. Students who depend on financial aid are disproportionately affected by food insecurity depending on their college and/or university. Financial aid may not cover all living expenses and can remain stagnant as living costs and tuition costs increase from

²⁰ Wooten, R., Spence, M., Colby, S., & Anderson Steeves, E. (2018, December 21). Assessing food insecurity prevalence and associated factors among college students enrolled in a university in the Southeast USA. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/30572972>

²¹ US Department of Agriculture, Food and Nutrition Service (2013) Guide to measuring household food security (revised 2000). <http://www.fns.usda.gov/guide-measuring-household-security-revised-2000>

year to year.²² And, although financial aid can link us to some of the student population where we may see these issues persist, there are still varying familial supports that create variances in the population of student need that could confidently be considered food insecure.

According to the study, a critical piece that had gone understudied is the “relationship between experiencing food insecurity prior to college and experiencing food insecurity during college.”²³ However, as part of the questions in the study, history with food security was captured. It was found that those of the students who responded to the survey as having food insecurity prior to attending college, they were 4.78 times more likely to be food insecure while in school compared to their peers. For student that had taken out loans, they were 1.42 times more likely to be food insecure than their peers. Similarly, students that had part-time jobs were about 1.28 times more likely to be food insecure than those who did not have part time jobs.

Overall, the study found that of the sample captured, 35.6% of students were reported being food insecure which was double the average rate of the general population within the same state.²⁴ The attention should be pointed towards students that had once been food insecure as they were 5 times more likely to be food insecure in college.

²² Gaines A, Robb CA, Knoll LL et al. (2014) Examining the role of financial factors, resources and skills in predicting food security status among college students. *Int J Consum Stud* 38, 374-384

²³ Wooten, R., Spence, M., Colby, S., & Anderson Steeves, E. (2018, December 21). Assessing food insecurity prevalence and associated factors among college students enrolled in a university in the Southeast USA. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/30572972>

²⁴ Coleman-Jensen A, Rabbitt, Matthew P et al. (2017) Household Food Security in the United States in 2016. Economic Research Report no. ERR-237. Washington, DC: US Department of Agriculture, Economic Research Service.

Students who had a lower self-reported GPA (<3.85) were also more likely to be food insecure than those with higher GPAs (3.85-4.00).²⁵⁻²⁶

Study Analysis: Urban Colleges

At one point in time, college was available only to students in a high socioeconomic group. However, as was noted with the changing demographics of students in higher education, colleges are “becoming more accessible to all populations, including those from low-income households.”²⁷ Food insecure students are more likely to be those who receive financial aid²⁸, are Black and Hispanic (1.5 times more likely)²⁹, to have jobs while in school, and have lower grades.³⁰ Knowing that there are already strong indicators attributed to food insecurity, a study conducted by Meg Bruening and the Academy of Nutrition and Dietetics, sought to review how food insecurity in an urban and diverse university affected health behaviors and outcomes in college freshmen³¹ knowing that food insecurity has been associated with poor nutritional health (risk of

²⁵ Morris LM, Smith S, Davis J et al. (2016) The prevalence of food security and insecurity among Illinois university students. *J Nutri Educ Behav* 48, 376-382.e1.

²⁶ Patton-Lopez MM, Lopez-Cevallos DF, Cancel-Tirado DI, et al. (2014) Prevalence and correlates of food insecurity among students attending a midsize rural university in Oregon. *J Nutr Educ Behav* 46, 209-214

²⁷ Bruening, M., Brennhof, S., Van Woerden, I., Todd, M., & Laska, M. (2016, May 18). Factors Related to the High Rates of Food Insecurity among Diverse, Urban College Freshmen. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/27212147>

²⁸ Gaines A, Robb CA, Knol LL, Sickler S. Examining the role of financial factors, resources and skills in predicting food security status among college students. *Int J Consum Stud*. 2014; 38(4): 374-384.

²⁹ Fredenberg N, Manzo L, Jones H, Kwan A, TSui E, Gagnon M. (April 2011) Food insecurity at CUNY: Results from a survey of CUNY undergraduate students. Campaign for a Healthy CUNY. https://www.gc.cuny.edu/CUNY_GC/media/CUNY-Graduate-Center/PDF/Centers/Center%20for%20Human%20Environments/cunyfoodinsecurity.pdf.

³⁰ Patton-Lopez MM, Lopez-Cevallos DF, Cancel-Tirado DI, et al. (2014) Prevalence and correlates of food insecurity among students attending a midsize rural university in Oregon. *J Nutr Educ Behav* 46, 209-214

³¹ Bruening, M., Brennhof, S., Van Woerden, I., Todd, M., & Laska, M. (2016, May 18). Factors Related to the High Rates of Food Insecurity among Diverse, Urban College Freshmen. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/27212147>

obesity and chronic disease).³² The study, which captured 209 college freshmen, all lived in on-campus residence halls. The study found that of the 209 students surveyed, 37% of participants reported as being food insecure in the previous 3 months. Notably, “students who rarely consumed breakfast, rarely ate home-cooked meals, and those with higher levels of depression were more likely to report food insecurity in the past 3 months.”

Food insecure students are likely to have limited expendable income which includes funding a meal plan. The study called to attention the gap in communication between what families know about transitioning to college life and the limited resources for students in higher education.³³ Bruening also sheds attention to different solutions other universities have explored as their changing student demographics have altered the wrap around services they have needed to offer. Examples include food pantries on college campuses and affordable meal plans as means to reach students who are food insecure. However, the limitations to this are attributed to stakeholder buy-in, budgets, and efficient advertising.

Existing Efforts to Combat Food Insecurity on College Campuses

In September of 2018, The Hope Center, a nonprofit action research center focused on higher education, released a report on campus food pantries across the US. The report, which was the first of its’ kind, looked at responses to a national survey on pantries on college campuses. The Hope Center considers food pantries as charitable and short-term responses to a much larger epidemic of poverty at the college-level. In

³² Gallegos D, Ramsey R, Ong KW. Food insecurity: Is it an issue among tertiary students? J High Educ. 2014;67(5): 497-510

³³ Bruening, M., Brennhof, S., Van Woerden, I., Todd, M., & Laska, M. (2016, May 18). Factors Related to the High Rates of Food Insecurity among Diverse, Urban College Freshmen. Retrieved from <https://www.ncbi.nlm.nih.gov/pubmed/27212147>

collaboration with the College and University Food Bank Alliance (CUFBA), the survey yielded responses from 217 pantries across 40 states.³⁴

The College and University Food Bank Alliance (CUFBA) is a membership organization for college pantries. College food pantries join the alliance at no-cost and receive technical support services in operating and maintaining a campus. As of September 2018, the organization included 686 independent members – an 87% increase in membership since 2012. Colleges and/or universities who join CUFBA must commit to learning about student food insecurity with the intention of developing a pantry. Support services from the organization include the following:

- One-on-one phone and email consultation
- Technical Assistance via campus visits
- Marketing and support material offering tips to mitigate and understand food insecurity on college campuses

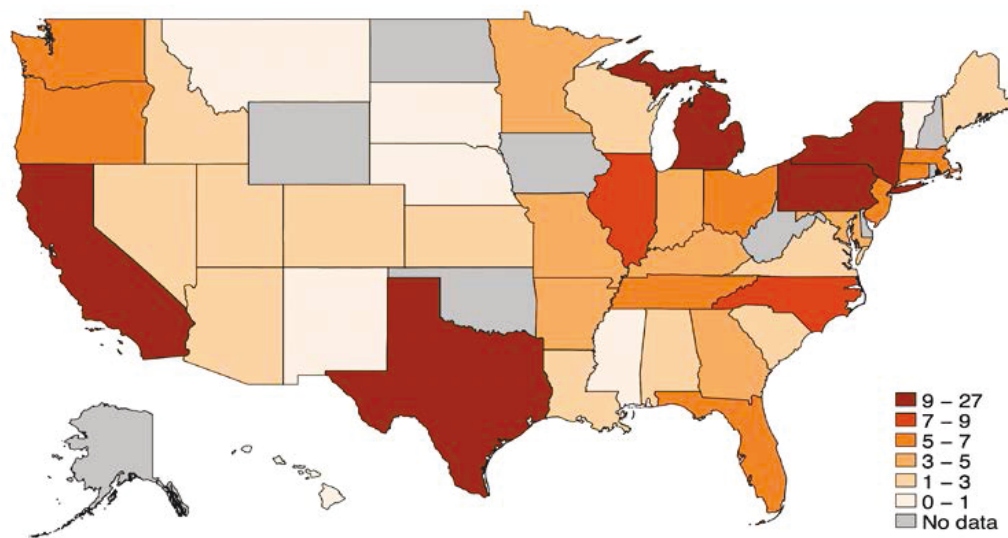
The Hope Center makes note that most other research available on food pantries on college campuses only measure student attitudes and not actually the operation of food pantries. The Achieving the Dream Study, conducted by the Working Students Success Network (WSSN), has been the most comprehensive examination of campus pantries across multiple institutions. The report, which captured analysis based on 13-member

³⁴ Goldrick-Rab, S., Cady, C., & Coca, V. (2018, September 28). CAMPUS FOOD PANTRIES: INSIGHTS FROM A NATIONAL SURVEY. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/2018-CUFBA-Report-web-2.pdf>

colleges, found that there are “three main considerations for a starting a food pantry – space, staffing, and sustainability.”³⁵

As part of the Hope Center and CUFBA’s goals with fulfilling the survey was to look at food pantry operations, trends, and weaknesses at existing institutions. Of the respondents to the survey, 68% of pantries are located at four-year colleges and universities and the remainder at two-year colleges. The higher concentrations of campus pantries operate in larger states such as California, Texas, Michigan, New York, and Pennsylvania.

The Hope Center: Map of Surveyed Institutions with Campus Pantries



Eighty-four percent of pantries opened within 1 year and in most cases, students were one of the primary drivers in getting a campus pantry started (70%). After students was staff

³⁵ Lenhart, C., & Petty, J. (2017). Addressing food insecurity on campus: Establishing food pantries at community colleges and connecting students to wider services. Silver Spring, MD: Working Students Success Network.

(82%), then administration (67%), faculty (54%), and lastly community partners (41%).³⁶ The Hope Center notes that one of the key challenges to keeping or opening a food pantry are insufficient funding (40%), enough food (25%), and labor capacity (17%). To keep pace with the costs of operating a pantry, over half of the existing programs collaborate with non-profit organizations or local food banks to offset operational costs and collect tax-exempt pantry donations. Eight-five percent of foods come from community donations. Sixty-five percent of campus pantries work with their campus foundations to have aligned procedures for legal, financial, and operating purposes. Other sources of partnerships include hunger relief organizations and religious organizations.

Overall, the report makes note of what signal having a food pantry on campus sends to students. Aside from providing food to students in need, pantries also tend to offer other services such as connecting students to financial and off-campus resources (66%), provide hygienic supplies, and helping them with counseling resources (26%) and SNAP benefits (29%).

Other initiatives led by schools include nutrition, cooking, and budget classes, as well as emergency funds for students, and educating staff, faculty, and students on food insecurity. As part of the U.S. Government Accountability Office study on food insecurity across college campuses, current measures to combat food insecurity were discussed with 14 colleges surveyed. The results were as follows:

³⁶ Goldrick-Rab, S., Cady, C., & Coca, V. (2018, September 28). CAMPUS FOOD PANTRIES: INSIGHTS FROM A NATIONAL SURVEY. Retrieved from <https://hope4college.com/wp-content/uploads/2018/09/2018-CUFBA-Report-web-2.pdf>

- **Educating the Campus Community:** To help address the issues attributed to food insecurity, campus wide education on resources available to students if they are or become food insecure. Eight of the universities captured in the survey held trainings or distributed information to staff about the community resources available. Nine of the schools had courses that taught nutrition education and/or financial literacy.
- **Providing Food and Emergency Financial Assistance:** Each of the 14 colleges surveyed had a food pantry of which 7 schools started their pantry within the past 5 years. At many schools, food pantries began out of faculty offices where staff would bring items like jars of peanut butter and bagels for students who needed food. One of the biggest issues noted by schools was the space to have a food pantry on campus. Once communication and awareness of the pantry was made known by student bodies, 9 of 14 colleges saw an increase in use of the resource.

Supplemental Nutrition Assistance Program (SNAP)

The National Postsecondary Student Aid Survey of 2012 revealed that only 27% of eligible SNAP recipients in college take advantage of the program. When students need assistance affording food, colleges and universities refer them to programs like SNAP. To qualify for the program, students must work at least 20 hours a week, take part of a Federal Work Study (FWS) program, have children, or participate in other programs.³⁷ In a more recent report generated by the U.S. Government Accountability

³⁷ United States Department of Agriculture. Supplemental Nutrition Assistance Program (SNAP). <https://www.fns.usda.gov/snap/students>

Office, “Food Insecurity: Better Information Could Help College Students Access Federal Food Assistance Benefits” one of the recommendation proposed from the report is that “the administrator of FNS should make information on their website regarding student SNAP eligibility requirements easier to understand and more accessible, as a resource for colleges and state SNAP agencies.”³⁸

Policy Proposal

To help combat food insecurity for low-income students on college campuses, I propose a two-prong solution. The first is for the Department of Education Office of Postsecondary Education work in collaboration with USDA School Meals Programs to expand the National School Lunch and Breakfast Program to 40% of college campuses in the first year of implementation. The second proposed solution is to have a Department of Education led marketing campaign, inclusive of a campus toolkit, for student life offices to assist with resource sharing and best-practices in dealing with college hunger on college campuses. The goal of this media proposal is to help close the gap in awareness and communication around food insecurity on college campuses by reaching at least 90% of student life offices on campuses that fall in the 60% of Pell grant recipient student population.

Expansion of USDA National School Lunch (NSLP) and Breakfast Program

Originally proposed by Sara Goldrick-Rab, a professor of Higher Education Policy and founder of the Wisconsin HOPE lab, a research laboratory focused on

³⁸ United States of America Government. U.S. Government Accountability Office. Report Published 2018. Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits. <https://www.gao.gov/products/GAO-19-95>

postsecondary education, the expansion of the NSLP and BSP program was introduced in 2016. According to a 2008 study conducted by the HOPE lab conducted across 2,000 Pell Grant recipients attending 42 colleges, 71% of first semester freshmen reported changing their eating habits because of limited funding.

Currently, NSLP allows students to receive free or reduced priced lunches if the family income is below the annual income poverty level. Pell grant recipients fall within the guidelines of NSLP where 85% of recipients have incomes below 200% of the poverty line.³⁹ Expanding the proposed program to all colleges and universities would affect 7 million Pell recipients and increase the participation in the NSLP program by 25%.

Although it is not realistic to expect a 100% program rollout across all colleges and universities in year 1, a staggered expansion could help address potential implementation issues and assess program success. As these students have already been identified as a high need population, for schools that have fall in the top 40% of Pell Grant recipient schools, they would be targeted as a high need initial target school. This could look like in two different ways:

1. A reimbursement model where the college and/or university submits federal claims to get reimbursed for meals consumed. Colleges and universities would need to track student meal participation and be able to provide proof via unique

³⁹ Goldrick-Rab, S., K. Broton, & D. Eisenberg. (2015). *Hungry to learn: Addressing food & housing insecurity among undergraduates*. Wisconsin HOPE Lab, Madison, WI. Retrieved from <https://postsecondary.gatesfoundation.org/wp-content/uploads/2016/11/Hungry-to-Learn.pdf>

student identifiers of which students would qualify as having received a meal for reimbursement.

2. If a student is a Pell grant recipient and is enrolled in a post-secondary institution, the college or university would receive a voucher for that student and add to the student's expense card for meal or food use only. This would help alleviate any stigma from having a different card from other students on campus. The money on their student ID expense card would be allowed for use in on-campus meal programs.

Funding for this expansion would require a partnership with the U.S. Department of Agriculture and stipulations for a 30% state matching to ensure that federal monies does not replace existing state level support in higher education. According to the U.S. Department of Education distribution of Federal Pell Grant Programs by institution, in SY16-19, there were 7,196,641 Pell Grant recipients across 5,384 post-secondary institutions. As Goldrick noted, full program expansion could total up to \$4 billion per year.⁴⁰ By targeting institutions with the greatest Pell grant population, we are reducing the overall cost to \$1.6 billion in Year 1 implementation. See below for a cost breakdown per student population with information retrieved from U.S. Department of Education.⁴¹

⁴⁰ Neuberger, Z. & Namian, T. (2016). Who benefits from federal subsidies for free and reduced price school meals? Center on Budget and Policy Priorities, Washington, D.C. Available at: <https://www.cbpp.org/research/who-benefits-from-federal-subsidies-for-free-and-reduced-price-school-meals>

⁴¹ U.S. Department of Education. (2018, June 15). Distribution of Federal Pell Grant Program Funds by Institution and Award Year. Retrieved from <https://www2.ed.gov/finaid/prof/resources/data/pell-institution.html>

Number of Students	Cost Per student	Cost per FY	% of total
1,798,690	\$555.96	\$1,000,000,000.00	25%
2,158,428	\$555.96	\$1,200,000,000.00	30%
2,877,904	\$555.96	\$1,600,000,000.00	40%
4,316,857	\$555.96	\$2,400,000,000.00	60%
5,755,809	\$555.96	\$3,199,999,460.45	80%
7,194,761	\$555.96	\$3,999,999,325.56	100%

By targeting 2,877,904 students, the proposal would also be targeting 268 institutions in at least 40 states.

Marketing Toolkit for College Campuses

The second solution that can help with communication gaps in resources to schools would be for the Department of Education to create a marketing campaign to address the concerns of food insecurity on college campuses. As part of the campaign, the Department of Education would work in tandem with U.S. Department of Agriculture (USDA) to develop a social media strategy that would communicate trends, statistics, and resources about food insecurity and college hunger. Working with USDA, this would help bring more attention to the different resources available to students through SNAP.

To equip schools with the information and tools needed to help food insecurity awareness and to provide resources to students in need, the Department of Education would be tasked with developing a toolkit that provides university officials with the following:

- Staff and faculty education module on campus hunger and food insecurity. This would help faculty identify students who may be food insecure but do not feel comfortable asking for help.
- Regional resources that universities could tap into if they find their student body has a need. A listing of regional food pantries, charities, and religious organizations that would be good partners for universities and colleges.
- Application guides for SNAP. Resources for SNAP eligibility including clear directions on eligibility and application requirements.
- Information on how to start a share-table or pantry at a school and leveraging nonprofit partners that lead in this space

The toolkit would serve as a way to primarily raise awareness on the issue, collect substantive information on the topic, and help leverage potential partnerships between community-based organizations and educational institutions. Areas that would require funding for the toolkit would be primarily tied to labor hours required to do the investigative research on nonprofits and community-based organizations that would go in the regional toolkits. This would also require coordination with USDA to ensure statistics and information being reported as part of the campaign is accurate and shared among partners to provide a greater reach in audience.

The cost of the media toolkit would be \$350,000. This would include a fulltime equivalent (FTE) to oversee the project, contractors for the curriculum toolkit development and design of the publication, mailing, distribution, and a social media messaging including email marketing. The funding would be housed within Department of Education. The toolkits would be made available on the Department of Education

website, to state education agencies, and distributed by email to Student Life offices on college campuses.

Policy Analysis

There is a lot to consider before rolling out the two proposed solutions. To better identify the different elements of each proposal, both will be looked at separately in terms of feasibility of implementation, cost effectiveness, and equity.

Proposed Solution 1: Partnership and Expansion of USDA National School Lunch Program

The USDA National School Lunch Program (NSLP) was signed into effect in 1946 under President Harry Truman. It provides over 30 million low-cost or free lunches to children on a typical school operating day. It costs the federal government over \$13 billion to operate the program per fiscal year. Studies show that if students have greater access to foods through the National School Lunch Program, have improved test scores.⁴² Lunch consumption directly and indirectly affects student's academic performance. Students with poor nutrition are more likely to become ill and miss classes.⁴³

Generally, more nutritious foods cost more than fast food which can hurt a student population that does not have the means to consume nutritionally beneficial meals. We know that for K-12 student population, consuming meals helps with behavioral issues

⁴² Frisvold, D. E. (2014, December 18). Nutrition and cognitive achievement: An evaluation of the School Breakfast Program. Retrieved from

<https://www.sciencedirect.com/science/article/abs/pii/S0047272714002497?via=ihub>

⁴³ Wilder Research. (2014, January). Nutrition and Students' Academic Performance. Retrieved from https://www.wilder.org/sites/default/files/imports/Cargill_lit_review_1-14.pdf

and attentiveness in the classroom.⁴⁴ College students generally know what constitutes as healthful eating habits. However, the transition to college causes significant changes in dietary options and patterns for activity. Many students choose meals according to convenience, taste, time, and price more so than nutritional values.⁴⁵ Students suffering from food insecurity have to decide between getting foods that are more affordable versus those that have more nutritional quality.

Although a USDA school meals program has not been introduced nationally at universities, there are some schools that have adapted a free meals program at their locations. An example of this is happening at New York University through the Courtesy Meals Program. The program began in the 2018-2019 school year and serves students who have an immediate need for nutrition support. Students on the meal program receive up to six free meal swipes at dining halls or seventy-five dollars in store credit at on-campus stores.⁴⁶ These funds are added directly onto a student's NYU ID. Although this is a step in a right direction, there is pushback from students and administration that six meals do not suffice the needs of food-insecure students. Rather, it is used most effectively for emergency situations. Alternatively, NYU also operates a Share Meals program where students can donate their unused meal swipes to those in need of food via a smartphone app. However, Share Meals is an independent organization that operates the

⁴⁴ Capbellsville University. (2019, January 11). The Impact of School Lunch on Student Performance. Retrieved from <https://online.campbellsville.edu/education/healthy-body-healthy-mind-the-impact-of-school-lunch-on-student-performance/>

⁴⁵ Abraham, S., Noriega, B. R., & Shin, J. Y. (2018, January 17). College students eating habits and knowledge of nutritional requirements. Retrieved from <http://www.alliedacademies.org/articles/college-students-eating-habits-and-knowledge-of-nutritional-requirements-9188.html>

⁴⁶ Brachfeld, B., & Brachfeld, B. (2018, April 12). Tisch Plans to Open a Food Pantry, a Longtime Goal of Campus Activists. Retrieved from <https://nyulocal.com/tisch-plans-to-open-a-food-pantry-a-longtime-goal-of-campus-activists-efc475db9559>

program with university students. Jon Chin, founder of Share Meals, shared that as of October 7, 2017, 469 meal swipes were shared on the app and have over 2,500 users, mostly from NYU. While these two examples do not explicitly show a federal program expansion for food insecure students, they do show a current university program that aims to provide a similar solution: free meals to students.

NSLP, at its current scale, costs the federal government \$13.6 billion to provide lunches to over 30 million students daily. With a 100% proposed expansion to all post-secondary institutions, the cost would equate to \$17.6 billion per year, a 4 billion dollar increase. However, as the proposal states, the implementation would not be at the 100% scale. According to the U.S. Department of Education, in SY16-17 there were 7,194,761 Pell Grant recipients.⁴⁷ If Goldrick's proposal of a \$4 billion increase would cover 100% of these students, it could be inferred that if the implementation is scaled down to only 40% of Pell Grant recipients, the cost would be \$1.6 billion. This would be a much lower cost to consider for year 1 of program implementation and provide both federal agencies with additional time to evaluate program success and plans for expansion at a higher rate.

Although the cost is much lower than the original \$4 billion, equity in program reach is questionable. Students would need to attend a school with a high Pell-grant student population to be eligible for this program. In negotiating the benefits to USDA School Meals Programs teams and leadership, having a full understanding of program expansion will be key to getting the implementation off of the ground and into full effect.

⁴⁷ U.S. Department of Education. (2018, June 15). Distribution of Federal Pell Grant Program Funds by Institution and Award Year. Retrieved from <https://www2.ed.gov/finaid/prof/resources/data/pell-institution.html>

Although there are substantial benefits to expansion of the program, there are also potential issues that should be raised. One of the key areas required for program expansion is amending current legislation to incorporate the following changes:

1. Modifications to the age limit eligibility for the program
2. Meal Components and Restrictions for Reimbursable Meals

Currently, the National School Lunch Program functions with the administration of the program at the state level. State agencies operate the program through agreements with school food authorities (SFA), typically public or non-profit private schools of high school grade or below.⁴⁸ Other child care institutions may also participate in the program as well as charter schools. At the SFA level, schools receive cash subsidies and USDA foods for each reimbursable meal they serve. These meals must meet federal meal requirements and offer free and/or reduced priced meals to eligible students. Meal patterns for lunch are only applicable for grades K-12. And while waivers to FNS can be submitted from State Agencies, on behalf of SFA's, this can become a roadblock when expansion is planned across the nation. It no longer becomes a case-by-case basis and rather a standard operating element of the program.

These federal requirements for meal patterns have also come at a cost for existing SFAs. For many food service programs at schools, the major challenges with NSLP implementation has been providing healthy meals that fall within the requirements that

⁴⁸ U.S. Department of Agriculture. (2017, November). THE NATIONAL SCHOOL LUNCH PROGRAM. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/cn/NSLPFactSheet.pdf>

are also appealing enough to students to encourage participation.⁴⁹ According to a report conducted by USDA on challenges faced by NSLP operators, many schools require selling “a la carte items that are not held to the same nutritional standards as the reimbursable meal, which affects the school meal environment as a whole.” Because of this, some state agencies have required schools have local wellness policies that make nutritional standards in schools and cafeterias much more strict and harder to meet. This, in coordination with the low reimbursement rates, have made it difficult for SFAs to financially operate NSLP. To help fill revenue gaps, many schools or SFA’s have had to source other local and state funding.

Proposal 2: Media Toolkit for College Campuses

The Government Accountability Office (GAO) released a report on food insecurity on college campuses and a call to action for a wholistic solution to college hunger. As part of the report, GAO proposed two recommendations:

“Recommendation: The Administrator of FNS should make information on their website regarding student SNAP eligibility requirements easier to understand and more accessible, as a resource for colleges and state SNAP agencies.

Agency Affected: Department of Agriculture: Office of the Secretary: Food, Nutrition and Consumer Services: Food and Nutrition Service

⁴⁹ U.S. Department of Education. (2018, March 15). Economic Research Service: National School Lunch Program. Retrieved from <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program/>

Recommendation: The Administrator of FNS should coordinate with its regional offices to collect and review information about existing SNAP flexibilities and examples of approaches state SNAP agencies are taking to assist eligible college students to access SNAP benefits, and share such information with state SNAP agencies.

Agency Affected: Department of Agriculture: Office of the Secretary: Food, Nutrition and Consumer Services: Food and Nutrition Service⁵⁰

Both of these recommendations put the burden on the USDA Food and Nutrition Services. While SNAP eligibility and administrative processes do occur at the Department of Agriculture, for food insecure students both in the K12 space and in postsecondary institutions, a shared responsibility exists with the Department of Education.

The second proposal includes a social media toolkit that is aimed at providing additional information to students in the post-secondary space on SNAP benefits – a specific tie to the second recommendation to the GAO report. To achieve the second proposal, much of the coordination would have to occur between the Department of Agriculture and the Department of Education. To ensure that consistent and correct information is messaged to families and students, it is critical for the Department of Agriculture to provide the sufficient information on SNAP regional offices and specific

⁵⁰ U.S. Department of Education. (2018, March 15). Economic Research Service: National School Lunch Program. Retrieved from <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program/>

language on eligibility. Getting the buy-in and support from USDA Food and Nutrition Services will be imperative to stay within budget.

If USDA Food and Nutrition Services is unable to provide the language and sufficient information regarding the regional SNAP offices, the FTE that is planned to support this project will be required to hire a consultant to assist with research and policy analysis to support the project. This will cause a budgetary burden in the long run if the partnership with USDA cannot be established in year 1 of implementation. After the first year, the FTE would be required to maintain the database of resources, complete a new cycle of distribution, and ensure that communication is made available to families alongside financial aid information.

By focusing distribution to campuses with an immediate Pell grant recipient population is in essence an opportunity to target schools with the highest need population. Messaging will also be important in this strategy as it could be seen as an unequitable distribution of resources across the country or to select universities that do not meet the requirements. In year 1, having it touch 90% of schools with a Pell grant population of 50% or higher is strategic in answering the immediate need from GAO. However, when looking at the long-term implementation of the toolkit, it will be crucial to expand to all university campuses.

The proposal's funding is \$350,000 can be justified to successfully implement the program. The budget supports the following: 1 program manager – an FTE at \$87,000 (75,000 Salary with 16% fringe), \$53,000 for a 1-year termed employee contractor as support staff responsible for education module development, \$50,000 creative consultant

for design, messaging, and strategic consulting, \$60,000 for webpage revamp and design, and \$100,000 for mailing and distribution. This is the most cost-effective way to get year 1 implementation off the ground and to best implement a foundation in which the fulltime personnel is able to keep up with in other fiscal years.

While 1 FTE managing the work is a big task, in year 1 implementation, the main priority is putting together the toolkit for distribution. This will require a lot of cross-collaboration between offices in the Department of Education and at the Department of Agriculture. The support staff will have to lean on best practice research for other nationwide implementation strategies to develop the education modules for college staff and faculty. There are enough consultants, support staff, and technical staff available to support the media toolkit implementation.

A final element to consider is what the communication will look like to college campuses and how accountability in distribution will be taken. Would schools be incentivized to use the information? What additional elements would the Department of Education consider to encourage student life offices to create their own marketing strategies at the local level to ensure students have the resources available to them? Providing these answers, while difficult, will help in seeing positive results from the campaign. It will not be an effective measure of success to only get the information distributed to student life offices. A more important segment of the success which is harder to quantify is what change can this make to students.

Political Analysis

The Department of Education currently has no legislative power on whether a child is eligible for free, reduced, or paid school meals. Understanding this is important as we consider the political context we are facing on student food and nutrition programs. In 2016, Republicans proposed a bill, *Improving Child Nutrition and Education Act of 2016* (H.R. 5003) that would ultimately affect the Obama-era made legislation to expand Community Eligible Provision (CEP) programming to schools with a 40% and higher direct certification rate. The bill stated that schools would be required to now meet a 60% threshold to be eligible.⁵¹ This drastic change to legislation did not get passed as part of the Child Nutrition Reauthorization but it does show opinions of legislators for school food and nutrition programs.

Current Secretary of Education, Betsy DeVos has created much controversy in her statements about social and federal programs that inherently help and support much of the student population that is most in need. Proposing a cross-collaborative proposal such as this will help the Department of Education show growth and involvement in the postsecondary space. For the first proposal, much of the pressure will be in the attitudes and reinforcement that this is critical to encourage, assist, and empower students to finish college or university. Without a program like this, we are risking students dropping out of school and requiring more long-term social programs to make ends meet (i.e. SNAP, Medicaid, etc.)

Secretary of Agriculture, Sonny Perdue, has lifted many existing nutritional requirements from USDA nutrition programs to help with student participation and to

⁵¹ Rathi, P. (2017, February 24). Should Schools Provide Free Lunch? DeVos Could End Nutrition Program For Poor Kids. Retrieved from <https://www.ibtimes.com/should-schools-provide-free-lunch-devos-could-end-nutrition-program-poor-kids-2497197>

make it more practical for schools to implement food service programs. These adjustments help in making foods for college students more appetizing which would help in the expansion of NSLP. We also know that Sec. Sonny Perdue, like Sec. DeVos, are conservative politicians. Ensuring that there is a long-term sustainability plan is imperative to get buy-in from both leaders. The rollback of nutritional standards has had immense pushback from reform groups and other legislators. The original requirements were set in place during the Obama administration under the Healthy, Hunger-Free Kids Act of 2010. With these new rollbacks, the push back is primarily centered around rolling back requirements when 90%+ schools were already meeting these requirements. Essentially, the government should be working with school districts that are not meeting the requirement as opposed to making the requirements looser.⁵²

For Sec. DeVos, this will help her overall standing with educators and individuals in the education space. Students and families will fare better if more support is tailored to students who are already struggling to pay for school and also struggling to feed themselves while at school. By the end of March 2018, Betsy DeVos was the most unfavorable cabinet member in Trump's administration. She was coming in at a 23% approval rating.⁵³ Promoting and backing legislation that could help approximately 7 million Pell grant students get affordable or no-cost meals in college would be a huge win for her administration – even if it does not get passed by congress. It is important to note that President Donald Trump would not be onboard with this. it would be important for

⁵² Jacobs, J. (2018, December 08). Trump Administration Rolls Back Obama-Era Rules for School Lunches. Retrieved from <https://www.nytimes.com/2018/12/08/us/trump-school-lunch-usda.html>

⁵³ Giaritelli, A. (2018, March 21). Jim Mattis has the highest approval rating in Trump's Cabinet, survey finds. Retrieved from <https://www.washingtonexaminer.com/news/jim-mattis-has-the-highest-approval-rating-in-trumps-cabinet-survey-finds>

Sec. DeVos to consider what may occur after President Trump leaves the White House and what her long-term career aspirations are after the Department of Education. Being able to support legislation and collaborate with another state agency is a formidable action that she could take part in to get public support and favorability.

Ultimately, the likelihood of NSLP expansion being funded and approved by congress is very slim. The cost to rollout the program in both the short term and in the long-term is very expensive. As Goldrick estimated, it would be \$4 billion per year in additional funding to USDA to support this program. Once students exceed age 18, the novelty of supporting them as adults shifts from a service to a child to a service to an adult. The messaging and support will be difficult to get from conservatives in this space. The political consequences with moving forward with this legislation is whether funding this proposal will take away from the k-12 education space.

George Leef, contributor to Forbes online also points out a sentiment regarding NSLP expansion that could be a barrier to consider while proposing this policy. Republican legislators have a history of being against social programs like Pell Grants.⁵⁴ Attitudes toward social programs, like education or Pell Grants are among the most contested when budget development and resolution is at play. For Leef, he argues that the constitution does not require the government to feed its citizens but because of the “entitlement” nation the US has become.⁵⁵ Knowing that these attitudes exist are

⁵⁴ Stratford, M. (2015, March 18). House Republicans again propose 10-year freeze on Pell Grant maximum award. Retrieved from <https://www.insidehighered.com/news/2015/03/18/house-republicans-again-propose-10-year-freeze-pell-grant-maximum-award>

⁵⁵ Leef, G. (2016, June 09). The Nanny State Wants To Grow: Free Lunches For College Students. Retrieved from <https://www.forbes.com/sites/georgeleef/2016/06/08/the-nanny-state-wants-to-grow-free-lunches-for-college-students/-37dbd4264c0b>

important to influencing a conservative administration. There will be opposition from conservative legislators who believe that furthering a program like Pell or NSLP will only cost the U.S. more money for little gain.

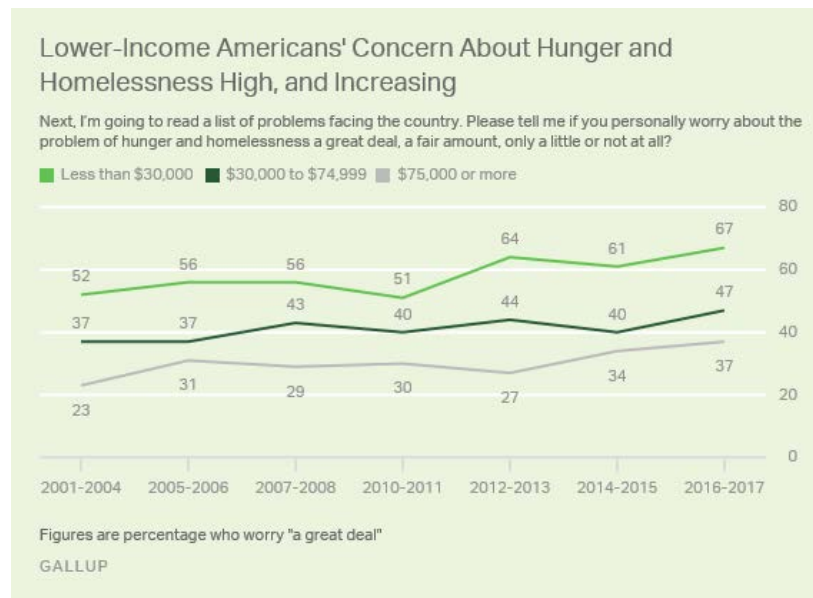
Because the second proposal requires a much lesser fiscal impact on the budget and because it will live primarily in-house at the Department of Education, the likelihood of getting support from within the administration is a lot higher. The Office of Post-Secondary Education (OPE) commits itself “to strengthen the capacity of colleges and universities to promote reform, innovation, and improvement in postsecondary education, promote and expand access to postsecondary education and increase college completion rates for America’s students.”⁵⁶ Providing universities and colleges with the tools necessary to retain students so that they are able to graduate is the mission of the office. Having the ability to distribute the media toolkit with education modules for staff will help provide more information on support strategies that can be implemented to help food insecure students.

The primary area that there may be pushback is identifying areas to cut funding to repurpose for this project. The idea is not to ask congress for additional funding for this project. Therefore, the funding needs to live in-house at the Department of Education. Being able to identify which areas to cut funding from will be something that needs to be considered as we look to expand programming to postsecondary students.

In a Gallup study conducted in 2017, it was found that on average, 67% of low-income adults worry a great deal about hunger and homelessness. For middle-income

⁵⁶ U.S. Department of Education. (2019, March 21). Office of Postsecondary Education Home Page. Retrieved from <https://www2.ed.gov/about/offices/list/ope/index.html>

Americans (income of \$30,000-\$74,999), the worry is at 47%.⁵⁷ It is important to consider what a new administration would consider if a Democratic president were to win the 2020 election or if both the house and senate were controlled by progressive legislators. Public opinion is important as you begin to consider change in leadership. Being able to work with both progressive and conservative policy makers and politicians is important to both stay relevant in your current position but also to consider the next phase of your goals. Through your work in alternative health and wellness and your interest in natural foods, this is a project that can tie in both the work you currently do for the Department of Education and also work that you completed prior at the Department of Labor and directly in the education sector.⁵⁸



Recommendation

⁵⁷ Gallup, Inc. (2017, March 30). Worry About Hunger, Homelessness Up for Lower-Income in U.S. Retrieved from <https://news.gallup.com/poll/207521/worry-hunger-homelessness-lower-income.aspx>

⁵⁸ U.S. Department of Education. (2018, September 27). Diane Jones, Principal Deputy Under Secretary. Retrieved from <https://www2.ed.gov/about/offices/list/oep/jones-bio.html>

In reviewing the proposal to expand the National School Lunch Program (NSLP) to schools with the highest enrollment of Pell Grant recipients, I would recommend against this. In reviewing the proposal to create a media toolkit for distribution, I would move to recommend for this.

The first proposal to expand the school meals program reveals a great deal of need for our student population in post-secondary institutions. Politically, the legislation to increase funding for NSLP and to include students over the age of 18 would not pass. However, the proposal does have strong elements that should be considered for future legislation in a different political landscape. The major positives of the program are policy-wise, providing students with an opportunity to receive a low-cost or free meal and essentially helping the college hunger problem in America. A second positive is the adaptability to incorporate this program on a smaller scale if the age restriction were to be lifted. Adjusting direct certification status (SNAP, TANF) to Pell Grant students and eligibility is a smart move if and when we are ready to move in this direction.

NSLP program expansion proposal is also very costly. For only 40% of students who are Pell Grant recipients, the cost would be \$1.6 billion. The overall legislation does not even consider students who are food insecure but are not Pell Grant recipients – making this a weaker policy resolution. When we consider the cost and the benefits of the policy, the cost outweighs the benefits of the policy in its current state. To have the benefits outweigh the costs, NSLP program would need to be adjusted for this higher education group to reduce restrictions in the meal program to enhance participation.

For the second proposed resolution – the media toolkit – provides the best benefits for the cost. The proposal and funding lives within the Department of Education, and while coordination with USDA is imperative, the work occurs internally. The proposed solution covers a wide variety of students, administration, and staff to inform and provide assistance to students who are food insecure.

While this proposal does not directly provide low-cost or free meals to students, it does help provide information to students on resources and SNAP eligibility. It also helps universities and colleges find more information on pantries and neighboring resources to better inform administration of the needs of their students and propose more creative solutions to fit their student population. The proposal is also a direct response to the GAO report on student hunger on college campuses. The Department of Education would be taking a stance for students and their success in post-secondary institutions. This is a scalable program that after year 1, communication efforts could potentially reach at least 4 million students.

The media toolkit is also more cost effective than the first proposal. The toolkit will cost \$350,000 for program implementation that could live in the Office of Postsecondary Education and has the opportunity to incorporate other elements in the future. It is also not politically damaging or can result in deflecting from current agency priorities. The toolkit is a neutral way for the Department of Education to show support and acknowledgement of the problem with food insecurity and college hunger.

Curriculum Vitae:

Yariany Perez-Nieto was born on April 30, 1993 in Southampton, New York. Yariany grew up in Eastern Long Island. She graduated in 2015 from American University in Washington, D.C. with a Bachelor of Arts in Political Science. Yariany is currently a Budget Specialist at District of Columbia Public Schools (DCPS), with a focus on school meal programs. She currently resides in Silver Spring, MD.